ADEQ Arizona Department of Environmental Quality
Janice K. Brewer, Governor
Henry R. Darwin, Director

DRAFT PERMIT

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY CLASS II PERMIT

PERMITTEE: **Sturm, Ruger and Company, Inc.**
FACILITY: **Sturm, Ruger & Company Prescott Facility**
PERMIT #: **58528**
DATE ISSUED:
EXPIRY DATE:

SUMMARY

This Class II air quality operating permit is issued to Sturm, Ruger and Company, Inc., the Permittee, for the continued operation of their small arms manufacturing facility located at 200 Ruger Road in Prescott, Arizona in Yavapai County. This is a renewal of Permit #45606.

The facility's potential to emit (PTE) for all pollutants, without controls or operating limitations, is less than major source thresholds but is greater than the significant levels for PM_{10} and $PM_{2.5,}$ therefore a Class II permit is required.

This permit is issued in accordance with Arizona Revised Statutes (ARS) 49-426. It contains requirements from Title 18, Chapter 2 of the A.A.C. and Title 40 of the Code of Federal Regulations. All definitions, terms, and conditions used in this permit conform to those in the Arizona Administrative Code R18-2-101 et. seq. (A.A.C.) and Title 40 of the Code of Federal Regulations (CFR), except as otherwise defined in this permit.

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ATTACHMENT "A": GENERAL PROVISIONS

Air Quality Control Permit No. 58528
For
Sturm, Ruger and Company, Inc.

I. PERMIT EXPIRATION AND RENEWAL

[ARS § 49-426.F, A.A.C. R18-2-304.C.2, and -306.A.1]

A. This permit is valid for a period of five years from the date of issuance.

B. The Permittee shall submit an application for renewal of this permit at least 6 months, but not more than 18 months, prior to the date of permit expiration.

II. COMPLIANCE WITH PERMIT CONDITIONS

[A.A.C. R18-2-306.A.8.a and b]

A. The Permittee shall comply with all conditions of this permit including all applicable requirements of the Arizona Revised Statutes (A.R.S.) Title 49, Chapter 3, and the and air quality rules under Title 18, Chapter 2 of the Arizona Administrative Code. Any noncompliance is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or for denial of a permit renewal application. In addition, noncompliance with any federally enforceable requirement constitutes a violation of the Clean Air Act.

B. It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

III. PERMIT REVISION, REOPENING, REVOCATION AND REISSUANCE, OR TERMINATION FOR CAUSE

[A.A.C. R18-2-306.A.8.c, -321.A.1, and -321.A.2]

A. The permit may be revised, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a permit revision, revocation and reissuance, termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

B. The permit shall be reopened and revised under any of the following circumstances

1. The Director or the Administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.

2. The Director or the Administrator determines that the permit needs to be revised or revoked to assure compliance with the applicable requirements.

C. Proceedings to reopen and reissue a permit, including appeal of any final action relating to a permit reopening, shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Such reopenings shall be made as expeditiously as practicable. Permit reopenings shall not result in a resetting of the five-year permit term.

IV. POSTING OF PERMIT

[A.A.C. R18-2-315]

A. The Permittee shall post this permit or a certificate of permit issuance where the facility is located in such a manner as to be clearly visible and accessible. All equipment covered by this permit shall be clearly marked with one of the following:

1. Current permit number; or

2. Serial number or other equipment ID number that is also listed in the permit to identify that piece of equipment.

B. A copy of the complete permit shall be kept on site.

V. FEE PAYMENT

[A.A.C. R18-2-306.A.9 and -326]

The Permittee shall pay fees to the Director pursuant to ARS § 49-426(E) and A.A.C. R18-2-326.

VI. ANNUAL EMISSION INVENTORY QUESTIONNAIRE

[A.A.C. R18-2-327.A and B]

A. The Permittee shall complete and submit to the Director an annual emissions inventory questionnaire. The questionnaire is due by March 31st or ninety days after the Director makes the inventory form available each year, whichever occurs later, and shall include emission information for the previous calendar year.

B. The questionnaire shall be on a form provided by the Director and shall include the information required by A.A.C. R18-2-327.

VII. COMPLIANCE CERTIFICATION

[A.A.C. R18-2-309.2.a, -309.2.c-d, and -309.5.d]

A. The Permittee shall submit a compliance certification to the Director annually which describes the compliance status of the source with respect to each permit condition. The certification shall be submitted no later than November 15th, and shall report the compliance status of the source during the period between October 1st of the previous year and September 30th of the current year.

B. The compliance certifications shall include the following:

1. Identification of each term or condition of the permit that is the basis of the certification;

2. The Identification of the methods or other means used by the Permittee for determining the compliance status with each term and condition during the certification period;

3. The status of compliance with the terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the methods or means designated in Condition VII.B.2 above. The certifications shall identify each deviation and take it into account for consideration in the compliance certification;

4. All instances of deviations from permit requirements reported pursuant to Condition XII.B of this Attachment; and

5. Other facts the Director may require determining the compliance status of the source.

C. A progress report on all outstanding compliance schedules shall be submitted every six months beginning with six months after permit issuance.

VIII. CERTIFICATION OF TRUTH, ACCURACY AND COMPLETENESS

[A.A.C. R18-2-304.H]

Any document required to be submitted by this permit, including reports, shall contain a certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

IX. INSPECTION AND ENTRY

[A.A.C. R18-2-309.4]

Upon presentation of proper credentials, the Permittee shall allow the Director or the authorized representative of the Director to:

A. Enter upon the Permittee's premises where a source is located, emissions-related activity is conducted, or where records are required to be kept under the conditions of the permit;

B. Have access to and copy, at reasonable times, any records that are required to be kept under the conditions of the permit;

C. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit;

D. Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or other applicable requirements; and

E. Record any inspection by use of written, electronic, magnetic and photographic media.

X. PERMIT REVISION PURSUANT TO FEDERAL HAZARDOUS AIR POLLUTANT STANDARD

[A.A.C. R18-2-304.C]

If this source becomes subject to a standard promulgated by the Administrator pursuant to Section 112(d) of the Act, then the Permittee shall, within twelve months of the date on which the standard is promulgated, submit an application for a permit revision demonstrating how the source will comply with the standard.

XI. ACCIDENTAL RELEASE PROGRAM

[40 CFR Part 68]

If this source becomes subject to the provisions of 40 CFR Part 68, then the Permittee shall comply with these provisions according to the time line specified in 40 CFR Part 68.

XII. EXCESS EMISSIONS, PERMIT DEVIATIONS, AND EMERGENCY REPORTING

A. Excess Emissions Reporting

[A.A.C. R18-2-310.01.A and -310.01.B]

1. Excess emissions shall be reported as follows:

   a. The Permittee shall report to the Director any emissions in excess of the limits established by this permit. Such report shall be in two parts as specified below:

      (1) Notification by telephone or facsimile within 24 hours of the time when the Permittee first learned of the occurrence of excess emissions including all available information from Condition XII.A.1.b below.

      (2) Detailed written notification by submission of an excess emissions report within 72 hours of the notification pursuant to Condition XII.A.1.a.(1) above.

   b. The report shall contain the following information:

      (1) Identity of each stack or other emission point where the excess emissions occurred;

      (2) Magnitude of the excess emissions expressed in the units of the applicable emission limitation and the operating data and calculations used in determining the magnitude of the excess emissions;

      (3) Date, time and duration, or expected duration, of the excess emissions;

      (4) Identity of the equipment from which the excess emissions emanated;

      (5) Nature and cause of such emissions;

      (6) If the excess emissions were the result of a malfunction, steps taken to remedy the malfunction and the steps taken or planned to prevent the recurrence of such malfunctions; and

      (7) Steps taken to limit the excess emissions. If the excess emissions resulted from start-up or malfunction, the report shall contain a list of the steps taken to comply with the permit procedures.

2. In the case of continuous or recurring excess emissions, the notification requirements of this section shall be satisfied if the source provides the required notification after excess emissions are first detected and includes in such notification an estimate of the time the excess emissions will continue. Excess emissions occurring after the estimated time period, or changes in the nature of the emissions as originally reported, shall require additional notification pursuant

to Condition XII.A.1 above.

[A.A.C. R18-2-310.01.C]

B. Permit Deviations Reporting

[A.A.C. R18-2-306.A.5.b]

The Permittee shall promptly report deviations from permit requirements, including those attributable to upset conditions as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. Prompt reporting shall mean that the report was submitted to the Director by certified mail, facsimile, or hand delivery within two working days of the time when emission limitations were exceeded due to an emergency or within two working days of the time when the owner or operator first learned of the occurrence of a deviation from a permit requirement.

C. Emergency Provision

[A.A.C. R18-2-306.E]

1. An "emergency" means any situation arising from sudden and reasonable unforeseeable events beyond the control of the source, including acts of God, that require immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

2. An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if Condition XII.C.3 below is met.

3. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

   a. An emergency occurred and that the Permittee can identify the cause(s) of the emergency;

   b. The permitted facility was being properly operated at the time;

   c. During the period of the emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards or other requirements in the permit; and

   d. The Permittee submitted notice of the emergency to the Director by certified mail, facsimile, or hand delivery within two working days of the time when emission limitations were exceeded due to the emergency. This notice shall contain a description of the emergency, any steps taken to mitigate emissions, and corrective action taken.

4. In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

5. This provision is in addition to any emergency or upset provision contained in any applicable requirement.

D. Compliance Schedule

[ARS § 49-426.I.5]

For any excess emission or permit deviation that cannot be corrected within 72 hours, the Permittee is required to submit a compliance schedule to the Director within 21 days of such occurrence. The compliance schedule shall include a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with the permit terms or conditions that have been violated.

E. Affirmative Defenses for Excess Emissions Due to Malfunctions, Startup, and Shutdown

[A.A.C. R18-2-310]

1. Applicability

This rule establishes affirmative defenses for certain emissions in excess of an emission standard or limitation and applies to all emission standards or limitations except for standards or limitations:

a. Promulgated pursuant to Sections 111 or 112 of the Act;

b. Promulgated pursuant to Titles IV or VI of the Clean Air Act;

c. Contained in any Prevention of Significant Deterioration (PSD) or New Source Review (NSR) permit issued by the U.S. EPA;

d. Contained in A.A.C. R18-2-715.F; or

e. Included in a permit to meet the requirements of A.A.C. R18-2-406.A.5.

2. Affirmative Defense for Malfunctions

Emissions in excess of an applicable emission limitation due to malfunction shall constitute a violation. When emissions in excess of an applicable emission limitation are due to a malfunction, the Permittee has an affirmative defense to a civil or administrative enforcement proceeding based on that violation, other than a judicial action seeking injunctive relief, if the Permittee has complied with the reporting requirements of A.A.C. R18-2-310.01 and has demonstrated all of the following:

a. The excess emissions resulted from a sudden and unavoidable breakdown of process equipment or air pollution control equipment beyond the reasonable control of the Permittee;

b. The air pollution control equipment, process equipment, or processes were at all times maintained and operated in a manner consistent with good practice for minimizing emissions;

c. If repairs were required, the repairs were made in an expeditious fashion when the applicable emission limitations were being exceeded. Off-shift labor and overtime were utilized where practicable to ensure that the repairs were made as expeditiously as possible. If off-shift labor and overtime were not utilized, the Permittee satisfactorily demonstrated that the measures were impracticable;

d. The amount and duration of the excess emissions (including any bypass operation) were minimized to the maximum extent practicable during periods of such emissions;

e. All reasonable steps were taken to minimize the impact of the excess emissions on ambient air quality;

f. The excess emissions were not part of a recurring pattern indicative of inadequate design, operation, or maintenance;

g. During the period of excess emissions there were no exceedances of the relevant ambient air quality standards established in Title 18, Chapter 2, Article 2 of the Arizona Administrative Code that could be attributed to the emitting source;

h. The excess emissions did not stem from any activity or event that could have been foreseen and avoided, or planned, and could not have been avoided by better operations and maintenance practices;

i. All emissions monitoring systems were kept in operation if at all practicable; and

j. The Permittee's actions in response to the excess emissions were documented by contemporaneous records

3. Affirmative Defense for Startup and Shutdown

a. Except as provided in Condition XII.E.3.b below, and unless otherwise provided for in the applicable requirement, emissions in excess of an applicable emission limitation due to startup and shutdown shall constitute a violation. When emissions in excess of an applicable emission limitation are due to startup and shutdown, the Permittee has an affirmative defense to a civil or administrative enforcement proceeding based on that violation, other than a judicial action seeking injunctive relief, if the Permittee has complied with the reporting requirements of A.A.C. R18-2-310.01 and has demonstrated all of the following:

(1) The excess emissions could not have been prevented through careful and prudent planning and design;

(2) If the excess emissions were the result of a bypass of control equipment, the bypass was unavoidable to prevent loss of life, personal injury, or severe damage to air pollution control equipment, production equipment, or other property;

(3) The air pollution control equipment, process equipment, or processes were at all times maintained and operated in a manner consistent with good practice for minimizing emissions;

(4) The amount and duration of the excess emissions (including any bypass operation) were minimized to the maximum extent practicable during periods of such emissions;

(5) All reasonable steps were taken to minimize the impact of the excess emissions on ambient air quality;

(6) During the period of excess emissions there were no exceedances of the relevant ambient air quality standards established in Title 18, Chapter 2, Article 2 of the Arizona Administrative Code that could be attributed to the emitting source;

(7) All emissions monitoring systems were kept in operation if at all practicable; and

(8) Contemporaneous records documented the Permittee's actions in response to the excess emissions.

b. If excess emissions occur due to a malfunction during routine startup and shutdown, then those instances shall be treated as other malfunctions subject to Condition XII.E.2 above.

4. Affirmative Defense for Malfunctions During Scheduled Maintenance

If excess emissions occur due to a malfunction during scheduled maintenance, then those instances will be treated as other malfunctions subject to Condition XII.E.2 above.

5. Demonstration of Reasonable and Practicable Measures

For an affirmative defense under Condition XII.E.2 or XII.E.3 above, the Permittee shall demonstrate, through submission of the data and information required by Condition XII.E and A.A.C. R18-2-310.01, that all reasonable and practicable measures within the Permittee's control were implemented to prevent the occurrence of the excess emissions.

XIII. RECORD KEEPING REQUIREMENTS

[A.A.C. R18-2-306.A.4]

A. The Permittee shall keep records of all required monitoring information including, but not limited to, the following:

1. The date, place as defined in the permit, and time of sampling or measurements;

2. The date(s) analyses were performed;

3. The name of the company or entity that performed the analyses;

4. A description of the analytical techniques or methods used;

5. The results of such analyses; and

6. The operating conditions as existing at the time of sampling or measurement.

B. The Permittee shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement,

report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings or other data recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

C. All required records shall be maintained either in an unchangeable electronic format or in a handwritten logbook utilizing indelible ink.

XIV. REPORTING REQUIREMENTS

[A.A.C. R18-2-306.A.5.a]

The Permittee shall submit the following reports:

A. Compliance certifications in accordance with Section VII of Attachment "A".

B. Excess emission; permit deviation, and emergency reports in accordance with Section XII of Attachment "A".

C. Other reports required by any condition of Attachment "B".

XV. DUTY TO PROVIDE INFORMATION

[A.A.C. R18-2-304.G and -306.A.8.e]

A. The Permittee shall furnish to the Director, within a reasonable time, any information that the Director may request in writing to determine whether cause exists for revising, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the Permittee shall also furnish to the Director copies of records required to be kept by the permit. For information claimed to be confidential, the Permittee shall furnish an additional copy of such records directly to the Administrator along with a claim of confidentiality.

B. If the Permittee has failed to submit any relevant facts or has submitted incorrect information in the permit application, the Permittee shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information.

XVI. PERMIT AMENDMENT OR REVISION

[A.A.C. R18-2-317.01, -318, -319, and -320]

The Permittee shall apply for a permit amendment or revision for changes to the facility which does not qualify for a facility change without revision under Section XVII below, as follows:

A. Facility Changes that Require a Permit Revision - Class II (A.A.C. R18-2-317.01);

B. Administrative Permit Amendment (A.A.C. R18-2-318);

C. Minor Permit Revision (A.A.C. R18-2-319); and

D. Significant Permit Revision (A.A.C. R18-2-320).

The applicability and requirements for such action are defined in the above referenced regulations.

XVII. FACILITY CHANGE WITHOUT A PERMIT REVISION

[A.A.C. R18-2-306.A.4 and -317.02]

A. Except for a physical change or change in the method of operation at a Class II source requiring a permit revision under A.A.C. R18-2-317.01, or a change subject to logging or notice requirements in Conditions XVII.B and XVII.C below, a change at a Class II source shall not be subject to revision, notice, or logging requirements under this Section.

B. Except as otherwise provided in the conditions applicable to an emissions cap created under A.A.C. R18-2-306.02, the following changes may be made if the source keeps on site records of the changes according to Appendix 3 of the Arizona Administrative Code:

1. Implementing an alternative operating scenario, including raw materials changes;

2. Changing process equipment, operating procedures, or making any other physical change if the permit requires the change to be logged;

3. Engaging in any new insignificant activity listed in A.A.C. R18-2-101.57.a through A.A.C. R18-2-101.57.i but not listed in the permit;

4. Replacing an item of air pollution control equipment listed in the permit with an identical (same model, different serial number) item. The Director may require verification of efficiency of the new equipment by performance tests; and

5. A change that results in a decrease in actual emissions if the source wants to claim credit for the decrease in determining whether the source has a net emissions increase for any purpose. The logged information shall include a description of the change that will produce the decrease in actual emissions. A decrease that has not been logged is creditable only if the decrease is quantifiable, enforceable, and otherwise qualifies as a creditable decrease.

C. Except as provided in the conditions applicable to an emissions cap created under A.A.C. R18-2-306.02, the following changes may be made if the source provides written notice to the Department in advance of the change as provided below:

1. Replacing an item of air pollution control equipment listed in the permit with one that is not identical but that is substantially similar and has the same or better pollutant removal efficiency: 7 days. The Director may require verification of efficiency of the new equipment by performance tests;

2. A physical change or change in the method of operation that increases actual emissions more than 10% of the major source threshold for any conventional pollutant but does not require a permit revision: 7 days;

3. Replacing an item of air pollution control equipment listed in the permit with one that is not substantially similar but that has the same or better efficiency: 30 days. The Director may require verification of efficiency of the new equipment by performance tests;

4. A change that would trigger an applicable requirement that already exists in the permit: 30 days unless otherwise required by the applicable requirement;

5. A change that amounts to reconstruction of the source or an affected facility: 7

days. For the purposes of this subsection, reconstruction of a source or an affected facility shall be presumed if the fixed capital cost of the new components exceeds 50% of the fixed capital cost of a comparable entirely new source or affected facility and the changes to the components have occurred over the 12 consecutive months beginning with commencement of construction; and

6. A change that will result in the emissions of a new regulated air pollutant above an applicable regulatory threshold but that does not trigger a new applicable requirement for that source category: 30 days. For purposes of this requirement, an applicable regulatory threshold for a conventional air pollutant shall be 10% of the applicable major source threshold for that pollutant.

D. For each change under Condition XVII.C above, the written notice shall be by certified mail or hand delivery and shall be received by the Director the minimum amount of time in advance of the change. Notifications of changes associated with emergency conditions, such as malfunctions necessitating the replacement of equipment, may be provided with less than required notice, but must be provided as far in advance of the change, or if advance notification is not practicable, as soon after the change as possible. The written notice shall include:

1. When the proposed change will occur;

2. A description of the change;

3. Any change in emissions of regulated air pollutants; and

4. Any permit term or condition that is no longer applicable as a result of the change.

E. A source may implement any change in Condition XVII.C above without the required notice by applying for a minor permit revision under A.A.C. R18-2-319 and complying with subsection A.A.C. R18-2-319.D.2 and A.A.C. R18-2-319.G.

F. The permit shield described in A.A.C. R18-2-325 shall not apply to any change made under this Section, other than implementation of an alternate operating scenario under Condition XVII.B.1 above.

G. Notwithstanding any other part of this Section, the Director may require a permit to be revised for any change that, when considered together with any other changes submitted by the same source under this Section over the term of the permit, constitutes a change under subsection A.A.C. R18-2-317.01.A.

H. If a source change is described under both Conditions XVII.B and XVII.C above, the source shall comply with Condition XVII.C above. If a source change is described under both Condition XVII.C above and A.A.C. R18-2-317.01.B, the source shall comply with A.A.C. R18-2-317.01.B.

I. A copy of all logs required under Condition XVII.B above shall be filed with the Director within 30 days after each anniversary of the permit issuance date. If no changes were made at the source requiring logging, a statement to that effect shall be filed instead.

J. Logging Requirements

[A.A.C. R18-2-306.A.4]

1. Each log entry required by a change under Condition XVII.B above shall include at least the following information:

    a. A description of the change, including:

        i. A description of any process change;

        ii. A description of any equipment change, including both old and new equipment descriptions, model numbers, and serial numbers, or any other unique equipment ID number; and

        iii. A description of any process material change.

    b. The date and time that the change occurred.

    c. The provision of A.A.C. R18-2-317.02.B that authorizes the change to be made with logging.

    d. The date the entry was made and the first and last name of the person making the entry.

2. Logs shall be kept for 5 years from the date created. Logging shall be performed in indelible ink in a bound log book with sequentially number pages, or in any other form, including electronic format, approved by the Director.

XVIII. TESTING REQUIREMENTS

[A.A.C. R18-2-312]

A. The Permittee shall conduct performance tests as specified in the permit and at such other times as may be required by the Director.

B. Operational Conditions During Testing

Tests shall be conducted during operation at the maximum possible capacity of each unit under representative operational conditions unless other conditions are required by the applicable test method or in this permit. With prior written approval from the Director, testing may be performed at a lower rate. Operations during periods of start-up, shutdown, and malfunction (as defined in A.A.C. R18-2-101) shall not constitute representative operational conditions unless otherwise specified in the applicable standard.

C. Tests shall be conducted and data reduced in accordance with the test methods and procedures contained in the Arizona Testing Manual unless modified by the Director pursuant to A.A.C. R18-2-312.B.

D. Test Plan

At least 14 calendar days prior to performing a test, the Permittee shall submit a test plan to the Director in accordance with A.A.C. R18-2-312.B and the Arizona Testing Manual. This test plan must include the following:

1. Test duration;

2. Test location(s);

3. Test method(s); and

4. Source operation and other parameters that may affect test results.

E. Stack Sampling Facilities

The Permittee shall provide, or cause to be provided, performance testing facilities as follows:

1. Sampling ports adequate for test methods applicable to the facility;

2. Safe sampling platform(s);

3. Safe access to sampling platform(s); and

4. Utilities for sampling and testing equipment.

F. Interpretation of Final Results

Each performance test shall consist of three separate runs using the applicable test method. Each run shall be conducted for the time and under the conditions specified in the applicable standard. For the purpose of determining compliance with an applicable standard, the arithmetic mean of the results of the three runs shall apply. In the event that a sample is accidentally lost or conditions occur in which one of the three runs is required to be discontinued because of forced shutdown, failure of an irreplaceable portion of the sample train, extreme meteorological conditions, or other circumstances beyond the Permittee's control, compliance may, upon the Director's approval, be determined using the arithmetic mean of the results of the other two runs. If the Director or the Director's designee is present, tests may only be stopped with the Director's or such designee's approval. If the Director or the Director's designee is not present, tests may only be stopped for good cause. Good cause includes: forced shutdown, failure of an irreplaceable portion of the sample train, extreme meteorological conditions, or other circumstances beyond the Permittee's control. Termination of any test without good cause after the first run is commenced shall constitute a failure of the test. Supporting documentation, which demonstrates good cause, must be submitted.

G. Report of Final Test Results

A written report of the results of all performance tests shall be submitted to the Director within 30 days after the test is performed. The report shall be submitted in accordance with the Arizona Testing Manual and A.A.C. R18-2-312.A.

XIX. PROPERTY RIGHTS

[A.A.C. R18-2-306.A.8.d]

This permit does not convey any property rights of any sort, or any exclusive privilege.

XX. SEVERABILITY CLAUSE

[A.A.C. R18-2-306.A.7]

The provisions of this permit are severable. In the event of a challenge to any portion of this permit, or if any portion of this permit is held invalid, the remaining permit conditions remain valid and in force.

XXI. PERMIT SHIELD

[A.A.C. R18-2-325]

Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements identified in the portions of this permit subtitled "Permit Shield". The permit shield shall not apply to any minor revisions pursuant to Condition XVI.C of this Attachment and any facility changes without a permit revision pursuant to Section XVII of this Attachment.

XXII. PROTECTION OF STRATOSPHERIC OZONE

[40 CFR Part 82]

If this source becomes subject to the provisions of 40 CFR Part 82, then the Permittee shall comply with these provisions accordingly.

XXIII. APPLICABILITY OF NSPS/NESHAP GENERAL PROVISIONS

[40 CFR Part 60, Part 63]

For all equipment subject to a New Source Performance Standard, the Permittee shall comply with all applicable requirements contained in Subpart A of Title 40, Chapter 60 and Chapter 63 of the Code of Federal Regulations.

ATTACHMENT "B": SPECIFIC CONDITIONS

Air Quality Control Permit No. 58528
For
Sturm, Ruger and Company, Inc.

I. FACILITY WIDE REQUIREMENTS

A. Operational Requirements

1. The Permittee shall have on-site or on-call a person who is certified in EPA Reference Method 9 for the observation and evaluation of visible emissions.

[A.A.C. R18-2-306.A.3.c]

2. The Permittee shall operate and maintain all equipment listed in Attachment "C" in accordance with manufacturer's specifications.

[A.A.C. R18-2-306.A.2]

B. Monitoring, Recordkeeping, and Reporting Requirements

1. At the time the compliance certifications required by Section VII of Attachment "A" are submitted, the Permittee shall submit reports of all monitoring activities required by this Attachment performed in the same period as applies to the compliance certifications.

[A.A.C. R18-2-306.A.5.a]

2. The Permittee shall maintain on-site records of the manufacturer's specifications for all equipment.

[A.A.C. R18-2-306.A.4]

3. The Permittee shall maintain records of all emission related maintenance activities performed on the emissions units and make them available to ADEQ upon request.

[A.A.C. R18-2-306.A.3.c]

II. SMALL ARMS MANUFACTURING

A. Applicability

This Section applies to all equipment listed in Attachment "C" except the fuel burning equipment (identified in Section III below) and the emergency generator.

B. Operational Requirements

1. The Permittee shall not emit gaseous or odorous materials from equipment, operations, or premises under the Permittee's control in such quantities or concentrations as to cause air pollution.

[A.A.C. R18-2-730.D]

2. Materials including solvents or other volatile compounds, paints, acids, alkalies, pesticides, fertilizers, and manure shall be processed, stored, used and transported in such a manner and by such means that they will not evaporate, leak, escape, or be otherwise discharged into the ambient air so as to cause or contribute to air

pollution. Where means are available to reduce effectively the contribution to air pollution from evaporation, leakage, or discharge, the installation and use of such control methods, devices, or equipment shall be mandatory.

[A.A.C. R18-2-730.F]

3. Where a stack, vent, or other outlet is at such a level that fumes, gas mist, odor, smoke, vapor, or any combination thereof constituting air pollution is discharged to adjoining property, the Director may require the installation of abatement equipment or the alteration of such stack, vent, or other outlet by the owner or operator thereof to a degree that will adequately dilute, reduce, or eliminate the discharge of air pollution to the adjoining property.

[A.A.C. R18-2-730.G]

4. Permit Shield

Compliance with the conditions of this Part shall be deemed compliance with A.A.C. R18-2-730.D, A.A.C. R18-2-730.F and A.A.C. R18-2-730.G.

[A.A.C. R18-2-325]

C. Particulate Matter and Opacity

1. Emission Limitations and Standards

a. The Permittee shall not cause or permit the discharge of particulate matter into the atmosphere in any 1 hour from any small arms manufacturing source in total quantities in excess of the amounts calculated by the following equation:

$E = 4.10P^{0.67}$

where:

E = the maximum allowable particulate emissions rate in pounds-mass per hour

P = the process weight rate in tons-mass per hour

[A.A.C. R18-2-730.A.1.a]

b. For purposes of this Section, the total process weight from all similar units employing a similar type process shall be used in determining the maximum allowable emission of particulate matter.

[A.A.C. R18-2-730.B]

c. The opacity of any plume or effluent from any small arms manufacturing source shall not be greater than 20%, as determined by EPA Reference Method 9. If the presence of uncombined water is the only reason for an exceedance of any visible emissions requirement, the exceedance shall not constitute a violation of the applicable opacity limit.

[A.A.C. R18-2-702.B.3 and -702.C]

2. Monitoring, Recordkeeping, and Reporting Requirements

[A.A.C. R18-2-306.A.3.c, -306.A.4, and –306.A.5]

a. A certified EPA Reference Method 9 observer shall conduct a monthly

visual survey of visible emissions emanating from each of the stacks associated with the equipment identified in Condition II.A of this Attachment and from the cooling towers. The Permittee shall keep a record of the name of the observer, date and time of the observation, location of the observation, emission point observed, and the results of the observation.

b. If during the monthly visual survey the observer sees a plume from any stack or cooling tower that on an instantaneous basis appears to exceed 20% opacity, then the observer shall take a six-minute EPA Reference Method 9 observation of the plume.

(1) If the six-minute average opacity of the plume is less than or equal to 20%, the observer shall record the name of the observer, date and time of the observation, location of the observation, emission point observed, and the results of the observation.

(2) If the six-minute average opacity of the plume exceeds 20%, the Permittee shall do the following:

(a) Immediately take corrective actions to reduce the opacity to below 20%;

(b) Record the name of the observer, date and time of the observation, location of the observation, emission point observed, results of the observation, and corrective actions taken;

(c) Report it as an excess emission under Condition XII.A of Attachment "A".

3. Air Pollution Control Requirements

a. Dust Collectors for Grinding, Sanding, and Polishing Operations (Equipment ID Numbers 9662, 567, and 2401)

(1) *The Permittee shall operate* and maintain *the three (3) dust collectors, connected to Stack ABB1 and Stack 110, to control particulate matter emissions from the grinding, sanding, and polishing operations in a manner consistent with good air pollution control practices.*

[A.A.C. R-18-2-306.01 and -331.A.3.e]
[Material Permit Condition is indicated by underline and italics]

(2) *The Permittee shall operate the grinding, sanding, and polishing operations process equipment in such a manner that the exhaust air does not bypass the three (3) dust collectors and is not directly vented to the atmosphere.*

[A.A.C. R-18-2-306.01 and -331.A.3.e]
[Material Permit Condition is indicated by underline and italics]

b. Dust Collector for Grit Blasting Operations (Equipment ID Number 2643)

(1) *The Permittee shall operate* and maintain *the dust collector, connected to Stack 130, to control particulate matter emissions from the two (2) grit blast booths (Equipment ID Numbers 5004 and 5006) in a manner consistent with good air pollution control practice.*

[A.A.C. R-18-2-306.01 and -331.A.3.e]
[Material Permit Condition is indicated by underline and italics]

(2) *The Permittee shall operate the two (2) grit blast booths in such a manner that the exhaust air does not bypass the dust collector and is not directly vented to the atmosphere.*

[A.A.C. R-18-2-306.01 and -331.A.3.e]
[Material Permit Condition is indicated by underline and italics]

c. Dust Collectors for Existing Gun Ranges (Equipment ID Numbers 9225 and 20026) and the Dust Collector for the New Gun Range (44,500 CFM – Eq. ID TBD) once it has been constructed

(1) *The Permittee shall operate* and maintain *the three (3) dust collectors, connected to Stack GD1, Stack GD4, and Stack GD5, to control particulate matter emissions from the three (3) gun ranges in a manner consistent with good air pollution control practices.*

[A.A.C. R-18-2-306.01 and -331.A.3.e]
[Material Permit Condition is indicated by underline and italics]

(2) *The Permittee shall operate the three (3) gun ranges in such a manner that the exhaust air does not bypass the three (3) dust collectors and is not directly vented to the atmosphere.*

[A.A.C. R-18-2-306.01 and -331.A.3.e]
[Material Permit Condition is indicated by underline and italics]

4. Permit Shield

Compliance with the conditions of this Part shall be deemed compliance with A.A.C. R18-2-702.B.3, A.A.C. R18-2-702.C, A.A.C. R18-2-730.A.1.a, and A.A.C. R18-2-730.B.

[A.A.C. R18-2-325]

D. Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs)

1. Air Pollution Control Requirements

a. Fume Scrubber for Existing Bluing/Pickling Process Operations (Equipment ID Number 0091) and the New Fume Scrubber (10,000 CFM – Eq. ID TBD) once the Bluing Process Operations has been re-arranged

(1) *The Permittee shall operate* and maintain *the two (2) fume scrubbers, connected to Stack GD2 and Stack GD6, to control VOCs and HAPs emissions from the bluing/pickling process operations in a manner consistent with good air pollution*

control practices.

[A.A.C. R-18-2-306.01 and -331.A.3.e]
[Material Permit Condition is indicated by underline and italics]

(2) *The Permittee shall operate the bluing/pickling operations process equipment in such a manner that the exhaust air does not bypass the two (2) fume scrubbers and is not directly vented to the atmosphere.*

[A.A.C. R-18-2-306.01 and -331.A.3.e]
[Material Permit Condition is indicated by underline and italics]

III. FUEL BURNING EQUIPMENT

A. Applicability

This Section applies to the Bluing/Salt Bath Heaters, Col Met Oven, Carburizing Furnaces, Tempering Furnace, Endo Gas Generator and the Oil-Water Evaporator (once installed) listed in Attachment "C".

B. Fuel Limitations

The Permittee shall only burn natural gas in the fuel burning equipment listed above.

[A.A.C. R18-2-306.A.2]

C. Particulate Matter and Opacity

1. Emissions Limitations and Standards

a. The Permittee shall not cause, allow or permit the emission of particulate matter, caused by combustion of fuel, from any fuel-burning operation into the atmosphere in excess of the amounts calculated by the following equation:

$E = 1.02Q^{0.769}$

Where

E = the maximum allowable particulate emission rate in pounds-mass per hour

Q = the heat input in million Btu per hour

[A.A.C. R18-2-724.C.1]

b. For purposes of this Section, the heat input shall be the aggregate heat content of all fuels whose products of combustion pass through a stack or other outlet. The total heat input of all fuel-burning units on a plant or premises shall be used for determining the maximum allowable amount of particulate matter which may be emitted.

[A.A.C. R18-2-724.B]

c. The Permittee shall not cause, allow or permit the opacity of any plume or effluent from the fuel burning equipment listed above to exceed 15%.

[A.A.C. R18-2-724.J]

2. Monitoring, Recordkeeping, and Reporting Requirements

a. The Permittee shall keep records of fuel supplier certifications containing information regarding the name of the fuel supplier and the lower heating value of the fuel. These records shall be made available to ADEQ upon request.

[A.A.C. R18-2-306.A.3.c]

b. The Permittee shall report all six-minute periods in which the opacity of any plume or effluent exceeds 15% as an excess emission under Condition XII.A of Attachment "A".

[A.A.C. R18-2-724.J]

3. Permit Shield

Compliance with the conditions of this Part shall be deemed compliance with A.A.C. R18-2-724.B, A.A.C R18-2-724.C.1, and A.A.C R18-2-724.J.

[A.A.C. R18-2-325]

IV. EMERGENCY GENERATOR

A. Applicability

This Section applies to the 1818 hp Caterpillar Generator listed in Attachment "C".

B. Particulate Matter and Opacity

1. Emission Limitations and Standards

a. The Permittee shall not cause, allow or permit the emission of particulate matter, caused by combustion of fuel, from any stationary rotating machinery in excess of the amounts calculated by the following equation:

$E = 1.02Q^{0.769}$

Where:

E = the maximum allowable particulate emissions rate in pounds-mass per hour

Q = the heat input in million Btu per hour

[A.A.C. R18-2-719.C.1]

b. For the purposes of this Section, the heat input shall be the aggregate heat content of all fuels whose products of combustion pass through a stack or other outlet. The total heat input of all operating fuel-burning units on a plant or premises shall be used for determining the maximum allowable amount of particulate matter which may be emitted.

[A.A.C. R18-2-719.B]

c. The Permittee shall not cause, allow or permit to be emitted into the atmosphere from any stationary rotating machinery, smoke for any period greater than 10 consecutive seconds which exceeds 40% opacity. Visible emissions when starting cold equipment shall be exempt from

this requirement for the first 10 minutes.

[A.A.C. R18-2-719.E]

2. Monitoring, Recordkeeping, and Reporting Requirements

[A.A.C. R18-2-306.A.3.c, -306.A.4, and –306.A.5]

a. A certified EPA Reference Method 9 observer shall conduct a quarterly visual survey of visible emissions emanating from the emergency generator stack when the emergency generator is in operation. The Permittee shall keep a record of the name of the observer, date and time of the observation, location of the observation, emission point observed, and the results of the observation.

b. If during the quarterly visual survey the observer sees a plume from the emergency generator stack that on an instantaneous basis appears to exceed 40% opacity, then the observer shall take a six-minute EPA Reference Method 9 observation of the plume. (Visible emissions when starting cold equipment shall be exempt from the 40% opacity requirement for the first 10 minutes).

(1) If the six-minute average opacity of the plume is less than or equal to 40%, the observer shall record the name of the observer, date and time of the observation, location of the observation, emission point observed, and the results of the observation.

(2) If the six-minute average opacity of the plume exceeds 40%, the Permittee shall do the following:

(a) Immediately take corrective actions to reduce the opacity to below 40%;

(b) Record the name of the observer, date and time of the observation, location of the observation, emission point observed, results of the observation, and corrective actions taken;

(c) Report it as an excess emission under Condition XII.A of Attachment "A".

3. Permit Shield

Compliance with the conditions of this Part shall be deemed compliance with A.A.C. R18-2-719.B, A.A.C. R18-2-719.C.1, and A.A.C. R18-2-719.E.

[A.A.C. R18-2-325]

C. Sulfur Dioxide

1. Emission Limitations and Standards

a. The Permittee shall burn fuel which limits the emission of sulfur dioxide to 1.0 pound per million Btu heat input.

[A.A.C. R18-2-719.F]

b. The use of high sulfur oil by the Permittee is prohibited (fuel oil

containing 0.90% or more by weight of sulfur).

[A.A.C. R18-2-719.H]

2. Monitoring, Recordkeeping, and Reporting Requirements

a. The Permittee shall record daily the sulfur content and lower heating value of the fuel being fired in the emergency generator.

[A.A.C. R18-2-719.I]

b. The Permittee shall report to the Director any daily periods during which the sulfur content of the fuel being fired in the emergency generator exceeds 0.8%.

[A.A.C. R18-2-719.J]

c. The Permittee shall keep records of fuel supplier certifications to demonstrate compliance with the sulfur content limit specified in Condition IV.C.1.b above. The certifications shall contain the name of the fuel supplier, the sulfur content of the fuel, and the method used to determine the sulfur content of the fuel. These records shall be made available to ADEQ upon request.

[A.A.C. R18-2-306.A.3.c]

3. Permit Shield

Compliance with the conditions of this Part shall be deemed compliance with A.A.C. R18-2-719.F, A.A.C. R18-2-719.H, A.A.C. R18-2-719.I, and A.A.C. R18-2-719.J.

[A.A.C. R18-2-325]

D. NESHAP Requirements for Generators

1. Operational Requirements

a. The Permittee shall minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes

[40 CFR 63.6625(h)]

b. The Permittee shall operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop a maintenance plan which shall provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions.

[40 CFR 63.6625(e)]

c. The Permittee shall operate the emergency stationary RICE according to the following requirements in Conditions IV.D.1.c.(1) through IV.D.1.c.(3) below. If the engine is not operated according to the requirements in Conditions IV.D.1.c.(1) through IV.D.1.c.(3) below, the engine will not be considered an emergency engine and shall meet all requirements for non-emergency engines.

[40 CFR 63.6640(f)]

(1) There is no time limit on the use of emergency stationary RICE in emergency situations.

(2) The Permittee may operate the emergency stationary RICE for any combination of the purposes specified in Conditions IV.D.1.c.(2)(a) through IV.D.1.c.(2)(c) below for a maximum of 100 hours per calendar year.

(a) Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The Permittee may petition the Administrator and the Director for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the Permittee maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.

(b) Emergency stationary RICE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies, or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.

(c) Emergency stationary RICE may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.

(3) The Permittee may operate the emergency stationary RICE for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response specified in Condition IV.D.1.c.(2) above. Except as provided in Conditions IV.D.1.c.(3).(a) and IV.D.1.c.(3).(b) below, the 50 hours per year for non-emergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.

(a) Prior to May 3, 2014, the 50 hours per year for non-emergency situations can be used for peak shaving or non-emergency demand response to generate income for a facility, or to otherwise supply power as part of a financial arrangement with another entity if the engine is

operated as part of a peak shaving (load management program) with the local distribution system operator and the power is provided only to the facility itself or to support the local distribution system.

(b) The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the conditions specified in 40 CFR 63.6640(f)(4)(ii)(A) through 40 CFR 63.6640(f)(4)(ii)(E) are met.

d. *The Permittee shall install a non-resettable hour meter if one is not already installed*.

[40 CFR 63.6625(f) and A.A.C. R18-2-331.A.3.c]
[Material Permit Condition is indicated by underline and italics]

e. The Permittee shall change oil and filter every 500 hours of operation or annually, whichever comes first. The Permittee has the option of utilizing an oil analysis program, as described below, in order to extend the oil change requirement.

Oil Analysis Program (optional) - The oil analysis shall be performed at the same frequency specified for changing the oil. The analysis program shall at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the Permittee is not required to change the oil. If any of the limits are exceeded, the Permittee shall change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the Permittee shall change the oil within 2 business days or before commencing operation, whichever is later. The Permittee shall keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program shall be part of the maintenance plan for the engine.

[40 CFR 63.6603(a), Table 2d to Subpart ZZZZ of 40 CFR Part 63, and40 CFR 63.6625(i)]

f. The Permittee shall inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary.

[40 CFR 63.6603 (a) and Table 2d to Subpart ZZZZ of 40 CFR Part 63]

g. The Permittee shall inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

[40 CFR 63.6603(a) and Table 2d to Subpart ZZZZ of 40 CFR Part 63]

2. Monitoring, Recordkeeping, and Reporting Requirements

a. The Permittee shall keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The Permittee shall document how many hours are spent for emergency operation, including what classified the operation as emergency, and how many

hours are spent for non-emergency operation. If the engine is used for the purposes of emergency demand response, voltage or frequency deviation, or to supply power as part of a financial arrangement, specified in Conditions IV.D.1.c.(2).(b), IV.D.1.c.(2).(c), or IV.D.1.c.(3).(b) of this Attachment, the Permittee shall keep records of the notification of the emergency situation, and the date, start time, and end time of engine operation for these purposes.

[40 CFR 63.6655(f)]

b. The Permittee shall keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the stationary RICE and after-treatment control device (if any) were operated and maintained according to the Permittee's maintenance plan.

[40 CFR 63.6655(e)]

3. Permit Shield

Compliance with the conditions of this Part shall be deemed compliance with 40 CFR 63.6603(a), 40 CFR 63.6625(e), 40 CFR 63.6625(f), 40 CFR 63.6625(h), 40 CFR 63.6625(i), 40 CFR 63.6640(f), 40 CFR 63.6655(f), 40 CFR 63.6655(e), and Table 2d to Subpart ZZZZ of 40 CFR Part 63.

[A.A.C. R18-2-325]

V. FUGITIVE DUST REQUIREMENTS

A. Applicability

This Section applies to any source of fugitive dust in the facility.

B. Particulate Matter and Opacity

Open Areas, Roadways & Streets, Storage Piles, and Material Handling

1. Emission Limitations and Standards

a. Opacity of an emission from any fugitive dust nonpoint source shall not be greater than 40%, measured according to EPA Reference Method 9.

[A.A.C. R18-2-614]

b. Opacity of any plume or effluent from any fugitive dust point source shall not be greater than 20%, as determined by EPA Reference Method 9. If the presence of uncombined water is the only reason for an exceedance of any visible emissions requirement, the exceedance shall not constitute a violation of the applicable opacity limit.

[A.A.C. R18-2-702.B.3 and -702.C]

c. The Permittee shall employ the following reasonable precautions to prevent excessive amounts of particulate matter from becoming airborne:

(1) Keep dust and other types of air contaminants to a minimum in an open area where construction operations, repair operations, demolition activities, clearing operations, leveling operations, or any earth moving or excavating activities are taking place, by good modern practices such as using an approved dust

suppressant or adhesive soil stabilizer, paving, covering, landscaping, continuous wetting, detouring, barring access, or other acceptable means;

[A.A.C. R18-2-604.A]

(2) Keep dust to a minimum from driveways, parking areas, and vacant lots where motor vehicular activity occurs by using an approved dust suppressant, or adhesive soil stabilizer, or by paving, or by barring access to the property, or by other acceptable means;

[A.A.C. R18-2-604.B]

(3) Keep dust and other particulates to a minimum by employing dust suppressants, temporary paving, detouring, wetting down or by other reasonable means when a roadway is repaired, constructed, or reconstructed;

[A.A.C. R18-2-605.A]

(4) Take reasonable precautions, such as wetting, applying dust suppressants, or covering the load when transporting material likely to give rise to airborne dust;

[A.A.C. R18-2-605.B]

(5) Take reasonable precautions, such as the use of spray bars, wetting agents, dust suppressants, covering the load, and hoods when crushing, handling, or conveying material likely to give rise to airborne dust;

[A.A.C. R18-2-606]

(6) Take reasonable precautions such as chemical stabilization, wetting, or covering when organic or inorganic dust producing material is being stacked, piled, or otherwise stored;

[A.A.C. R18-2-607.A]

(7) Operate stacking and reclaiming machinery utilized at storage piles at all times with a minimum fall of material, or with the use of spray bars and wetting agents;

[A.A.C. R18-2-607.B]

(8) Operate mineral tailings piles by taking reasonable precautions to prevent excessive amounts of particulate matter from becoming airborne. Reasonable precautions shall mean wetting, chemical stabilization, revegetation or such other measures as are approved by the Director.

[A.A.C R18-2-608]

(9) Any other method as proposed by the Permittee and approved by the Director.

[A.A.C. R18-2-306.A.3.c]

2. Monitoring, Recordkeeping, and Reporting Requirements

a. The Permittee shall maintain records of the dates on which any of the activities listed in Conditions V.B.1.c.(1) through V.B.1.c.(9) above were

performed and the control measures that were adopted.

[A.A.C. R18-2-306.A.3.c]

b. Opacity Monitoring Requirements

[A.A.C. R18-2-306.A.3.c, -306.A.4, and –306.A.5]

(1) A certified EPA Reference Method 9 observer shall conduct a monthly visual survey of visible emissions emanating from the fugitive dust sources. The Permittee shall keep a record of the name of the observer, date and time of the observation, location of the observation, emission point observed, and the results of the observation.

(2) If during the monthly visual survey the observer sees a plume from any fugitive dust source that on an instantaneous basis appears to exceed the applicable opacity standard, then the observer shall take a six-minute EPA Reference Method 9 observation of the plume, if practicable.

(a) If the six-minute average opacity of the plume is less than or equal to the applicable opacity standard, the observer shall record the name of the observer, date and time of the observation, location of the observation, emission point observed, and the results of the observation.

(b) If the six-minute average opacity of the plume exceeds the applicable opacity standard, the Permittee shall do the following:

(i) Immediately take corrective actions to reduce the opacity to below the applicable opacity standard;

(ii) Record the name of the observer, date and time of the observation, location of the observation, emission point observed, results of the observation, and corrective actions taken;

(iii) Report it as an excess emission under Condition XII.A of Attachment "A".

3. Permit Shield

Compliance with the conditions of this Part shall be deemed compliance with A.A.C. R18-2-604.A, A.A.C. R18-2-604.B, A.A.C. R18-2-605, A.A.C. R18-2-606, A.A.C. R18-2-607, A.A.C. R18-2-608, A.A.C. R18-2-702.B.3, and A.A.C. R18-2-702.C

[A.A.C. R18-2-325]

VI. MOBILE SOURCE REQUIREMENTS

A. Applicability

The requirements of this Section are applicable to mobile sources which either move while emitting air contaminants or are frequently moved during the course of their utilization but are not classified as motor vehicles, agricultural vehicles, or agricultural equipment used in normal farm operations. Mobile sources shall not include portable sources as defined in A.A.C. R18-2-101.108.

[A.A.C. R18-2-801.A]

B. Particulate Matter and Opacity

1. Emission Limitations and Standards

a. Off-Road Machinery

The Permittee shall not cause, allow, or permit to be emitted into the atmosphere from any off-road machinery, smoke for any period greater than 10 consecutive seconds, the opacity of which exceeds 40%. Visible emissions when starting cold equipment shall be exempt from this requirement for the first 10 minutes. Off-road machinery shall include trucks, graders, scrapers, rollers, locomotives, and other construction and mining machinery not normally driven on a completed public roadway.

[A.A.C. R18-2-802]

b. Roadway and Site Cleaning Machinery

(1) The Permittee shall not cause, allow, or permit to be emitted into the atmosphere from any roadway and site cleaning machinery smoke or dust for any period greater than 10 consecutive seconds, the opacity of which exceeds 40%. Visible emissions when starting cold equipment shall be exempt from this requirement for the first 10 minutes.

[A.A.C. R18-2-804.A]

(2) The Permittee shall not cause, allow, or permit the cleaning of any site, roadway, or alley without taking reasonable precautions to prevent particulate matter from becoming airborne. Reasonable precautions may include applying dust suppressants. Earth or other material shall be removed from paved streets onto which earth or other material has been transported by trucking or earth moving equipment, erosion by water, or by other means.

[A.A.C. R18-2-804.B]

c. Unless otherwise specified, no mobile source shall emit smoke or dust the opacity of which exceeds 40%.

[A.A.C. R18-2-801.B]

2. Monitoring, Recordkeeping, and Reporting Requirements

The Permittee shall keep a record of all emissions related maintenance activities performed on the Permittee's mobile sources stationed at the facility as per

manufacturer's specifications.

[A.A.C. R18-2-306.A.4]

3. Permit Shield

Compliance with the conditions of this Part shall be deemed compliance with A.A.C. R18-2-801, A.A.C. R18-2-802, and A.A.C. R18-2-804

[A.A.C. R18-2-325]

VII. OTHER PERIODIC ACTIVITIES

A. Sandblasting and Other Abrasive Blasting Operations
(Except for the facility's continuous Grit Blasting Operations which are covered by Section II of Attachment "B".)

1. Particulate Matter and Opacity

a. Emission Limitations and Standards

(1) The Permittee shall not cause or permit sandblasting or other abrasive blasting without minimizing dust emissions to the atmosphere through the use of good modern practices. Examples of good modern practices include:

(a) Wet blasting;

(b) The use of effective enclosures with necessary dust collecting equipment; or

(c) Any other method approved by the Director.

[A.A.C. R18-2-726]

(2) The opacity of any plume or effluent from any sandblasting or other abrasive blasting source shall not be greater than 20%, as determined by EPA Reference Method 9. If the presence of uncombined water is the only reason for an exceedance of any visible emissions requirement, the exceedance shall not constitute a violation of the applicable opacity limit.

[A.A.C. R18-2-702.B.3 and -702.C]

2. Monitoring, Recordkeeping, and Reporting Requirements

Each time a sandblasting or other abrasive blasting project is conducted, the Permittee shall make a record of the following:

a. The date the project was conducted;

b. The duration of the project; and

c. Type of control measures employed.

[A.A.C. R18-2-306.A.3.c]

3. Permit Shield

Compliance with the conditions of this Part shall be deemed compliance with A.A.C. R18-2-702.B.3, A.A.C. R18-2-702.C, and A.A.C. R18-2-726.

[A.A.C. R18-2-325]

B. Spray Painting Operations

1. Volatile Organic Compounds (VOCs)

a. Emission Limitations and Standards

While performing spray painting operations, the Permittee shall comply with the following requirements:

(1) The Permittee shall not conduct any spray painting operation without minimizing organic solvent emissions. Such operations, other than architectural coating and spot painting, shall be conducted in an enclosed area equipped with controls containing no less than 96% of the overspray.

[A.A.C. R18-2-727.A]

(2) The Permittee or their designated contractor shall not either:

(a) Employ, apply, evaporate, or dry any architectural coating containing photochemically reactive solvents for industrial or commercial purposes; or

(b) Thin or dilute any architectural coating with a photochemically reactive solvent.

[A.A.C.R18-2-727.B]

(3) For purposes of Condition VII.B.1.a.(2) above, a photochemically reactive solvent shall be any solvent with an aggregate of more than 20% of its total volume composed of the chemical compounds classified in Conditions VII.B.1.a.(3)(a) through VII.B.1.a.(3)(c) below, or which exceeds any of the following percentage composition limitations, referred to the total volume of solvent:

(a) A combination of the following types of compounds having an olefinic or cyclo-olefinic type of unsaturation -- hydrocarbons, alcohols, aldehydes, esters, ethers, or ketones: 5%.

(b) A combination of aromatic compounds with 8 or more carbon atoms to the molecule except ethylbenzene: 8%.

(c) A combination of ethylbenzene, ketones having branched hydrocarbon structures, trichlorethylene or toluene: 20%.

[A.A.C. R18-2-727.C]

(4) Whenever any organic solvent or any constituent of an organic

solvent may be classified from its chemical structure into more than one of the groups of organic compounds described in Conditions VII.B.1.a.(3)(a) through VII.B.1.a.(3)(c) above, it shall be considered to be a member of the group having the least allowable percent of the total volume of solvents.

[A.A.C.R18-2-727.D]

b. Monitoring, Recordkeeping, and Reporting Requirements

[A.A.C. R18-2-306.A.3.c]

(1) Each time a spray painting project is conducted, the Permittee shall make a record of the following:

(a) The date the project was conducted;

(b) The duration of the project;

(c) Type of control measures employed;

(d) Material Safety Data Sheets for all paints and solvents used in the project; and

(e) The amount of paint consumed during the project.

(2) Architectural coating and spot painting projects shall be exempt from the recordkeeping requirements of Condition VII.B.1.b.(1) above.

2. Particulate Matter and Opacity

a. Emission Limitations and Standards

The opacity of any plume or effluent from any spray painting source shall not be greater than 20%, as determined by EPA Reference Method 9. If the presence of uncombined water is the only reason for an exceedance of any visible emissions requirement, the exceedance shall not constitute a violation of the applicable opacity limit.

[A.A.C. R18-2-702.B.3 and -702.C]

3. Permit Shield

Compliance with the conditions of this Part shall be deemed compliance with A.A.C. R18-2-702.B.3, A.A.C. R18-2-702.C, and A.A.C. R18-2-727.

[A.A.C. R18-2-325]

C. Demolition/Renovation - Hazardous Air Pollutants - Asbestos

1. Emission Limitations and Standards

The Permittee shall comply with all of the requirements of 40 CFR 61 Subpart M (National Emissions Standards for Hazardous Air Pollutants - Asbestos).

[A.A.C. R18-2-1101.A.8]

2. Monitoring, Recordkeeping, and Reporting Requirements

The Permittee shall keep all required records in a file. The required records shall include the "NESHAP Notification for Renovation and Demolition Activities" form and all supporting documents.

[A.A.C. R18-2-306.A.3.c]

3. Permit Shield

Compliance with the conditions of this Part shall be deemed compliance with A.A.C. R18-2-1101.A.8.

[A.A.C. R18-2-325]

ATTACHMENT "C": EQUIPMENT LIST

Air Quality Control Permit No. 58528
For
Sturm, Ruger and Company, Inc.

EQUIPMENT TYPE	MAX. CAPACITY	MAKE	MODEL	SERIAL NUMBER	DATE OF MFG.	Equipment ID Number	Stack ID
Polishing Jack – Abrasive Belt Grinder	230 parts/hr	Hammond	UBG-8-65	NA	NA	5101	110
Polishing Jack – Abrasive Belt Grinder	230 parts/hr	Hammond	UBG-8-65	NA	NA	5103	110
Polishing Jack – Abrasive Belt Grinder	230 parts/hr	Hammond	UBG-8-65	NA	NA	5105	110
Polishing Jack – Abrasive Belt Grinder	230 parts/hr	Hammond	UBG-8-65	NA	NA	5106	110
Polishing Jack – Abrasive Belt Grinder	230 parts/hr	Hammond	UBG-8-65	NA	NA	5107	110
Polishing Jack – Abrasive Belt Grinder	230 parts/hr	Hammond	UBG-8-65	NA	NA	5109	110
Polishing Jack – Abrasive Belt Grinder	230 parts/hr	Hammond	UBG-8-65	3940	NA	5110	110
Polishing Jack – Abrasive Belt Grinder	230 parts/hr	Hammond	UBG-8-65	NA	NA	5111	110
Polishing Jack – Abrasive Belt Grinder	230 parts/hr	Hammond	UBG-8-65	NA	NA	5112	110
Polishing Jack – Abrasive Belt Grinder	230 parts/hr	Hammond	UBG-8-65	NA	NA	5113	110
Polishing Jack – Abrasive Belt Grinder	230 parts/hr	Hammond	UBG-8-65	NA	NA	5114	110
Polishing Jack – Abrasive Belt Grinder	230 parts/hr	Hammond	UBG-8-65	NA	NA	5115	110
Polishing Jack – Abrasive Belt Grinder	230 parts/hr	Hammond	UBG-8-65	3798	NA	5117	110
Polishing Jack – Abrasive Belt Grinder	230 parts/hr	Hammond	UBG-8-65	NA	NA	5118	110
Polishing Jack – Abrasive Belt Grinder	230 parts/hr	Hammond	UBG-8-65	3939	NA	5124	110
Sanding Lathe	75 parts/hr	Kalamazoo Industries Inc.	BSG-8	0413002	2013	20031	110
Sanding Lathe	75 parts/hr	Kalamazoo Industries Inc.	BSG-8	0413001	2013	20032	110
Wet Dust Collector	7,500 CFM	UNI-WASH	UCBD-75	16306-B	Jun-96	567	110
Polishing Jack – Abrasive Belt Grinder	230 parts/hr	Hammond	UBG-8-65	7105H	NA	5119	110
Polishing Jack – Abrasive Belt Grinder	230 parts/hr	Hammond	UBG-8-65	NA	NA	5120	110
Polishing Jack – Abrasive Belt Grinder	230 parts/hr	Hammond	UBG-8-65	NA	NA	5121	110
Polishing Jack – Abrasive Belt Grinder	230 parts/hr	Hammond	UBG-8-65	NA	NA	5122	110
Polishing Jack – Abrasive Belt Grinder	230 parts/hr	Hammond	UBG-8-65	3938	NA	5123	110

EQUIPMENT TYPE	MAX. CAPACITY	MAKE	MODEL	SERIAL NUMBER	DATE OF MFG.	Equipment ID Number	Stack ID
Magazine Sander	550 parts/hr	Ruger	.22 Magazine Sander	6950 80B001	1990	5151	110
Hammond Flat Grinder	230 parts/hr	Hammond	VH-600-D	1104	NA	6002	110
Wet Dust Collector	15,000 CFM	UNI-WASH	UC-150C	3220	Jul-90	2401	110
Polishing Jack – Abrasive Belt Grinder	230 parts/hr	Hammond	UBG-8-65	3997	NA	0559	ABB1
Polishing Jack – Abrasive Belt Grinder	230 parts/hr	Hammond	UBG-8-65	3940	NA	5125	ABB1
Hammond Polishing Jack	230 parts/hr	Hammond	UB-65-65	4169	NA	9762	ABB1
ABB Robot (Grinder)	15 parts/hr	ABB	IRB4400M98A	44-12003	1998	11011	ABB1
Cartridge Dust Collector	5,400 CFM	Micro Clean Air	RP8	912297	Dec-09	9662	ABB1
Grit Blast Booth	600 lbs grit/day	Pressure Blast Mfg	DB-207	892450	NA	5004	130
Grit Blast Booth	600 lbs grit/day	Pressure Blast Mfg	DB-207	942578	NA	5006	130
Dust Collector	1,213 CFM	Ruemelin	VAC-550	37962	1971	2643	130
Fume Scrubber	10,000 CFM	Duall Industries	FW-303-64S	9899	2004	0091	GD2
Fume Scrubber (New)	10,000 CFM	NA	NA	NA	NA	NA	GD6
Dust Collector (Range)	17,670 CFM	Farr Air Pollution	Tenkay Mark III-60L	84061024-2	NA	9225	GD1
Dust Collector (New Range)	44,500 CFM	TBD	TBD	TBD	NA	TBD	GD5
Dust Collector (CS Range)	4,000 CFM	Peerless	PW-14	TBD	TBD	20026	GD4
Caterpillar Generator	1,818 HP	Caterpillar	NA	24Z07476	1996	AHF0930	G1
Bluing/Salt Bath Heaters	0.01 MMBtu/hr	Du-Lite Corp.	NA	NA	NA	20012	GD3
Bluing/Salt Bath Heaters	0.01 MMBtu/hr	Du-Lite Corp.	NA	NA	NA	20013	GD3
Bluing/Salt Bath Heaters	0.01 MMBtu/hr	Du-Lite Corp.	NA	NA	NA	20015	GD3
Bluing/Salt Bath Heaters	0.01 MMBtu/hr	Du-Lite Corp.	NA	NA	NA	20016	GD3
Bluing/Salt Bath Heaters	0.01 MMBtu/hr	Du-Lite Corp.	NA	NA	NA	20017	GD3
Bluing/Salt Bath Heaters	0.01 MMBtu/hr	Du-Lite Corp.	NA	NA	NA	20018	GD3
Bluing/Salt Bath Heaters	0.01 MMBtu/hr	Du-Lite Corp.	NA	NA	NA	20021	GD3
Bluing/Salt Bath Heaters	0.01 MMBtu/hr	Du-Lite Corp.	NA	NA	NA	20023	GD3
Bluing/Salt Bath Heaters	0.01 MMBtu/hr	Du-Lite Corp.	NA	NA	NA	20025	GD3
Col Met Oven	0.39 MMBtu/hr	Col-MET	8050605BCPL	02-168307-1-1	2002	11198	HT1

EQUIPMENT TYPE	MAX. CAPACITY	MAKE	MODEL	SERIAL NUMBER	DATE OF MFG.	Equipment ID Number	Stack ID
Carburizing Furnace	0.60 MMBtu/hr	IPSEN	TFQ-7G	59360	May-85	0068	HT2
Carburizing Furnace	0.45 MMBtu/hr	IPSEN	T-4-600	54140	Jun-68	0070	HT2
Carburizing Furnace	0.37 MMBtu/hr	IPSEN	ATLAS T M	20.2174-10	2012	9886	HT2
Tempering Furnace	0.15 MMBtu/hr	IPSEN	DC-4-600G	54141	Jun-68	0071	HT2
Endo Gas Generator	0.20 MMBtu/hr	IPSEN	G-1000G	20.2174-50	2012	9887	HT2
Kwic Seal Tank	NA	NA	NA	NA	NA	20011	GD2
Cooling Tower	204 gpm	Baltimore Aircoil Co.	FXT-68C	95401432	TBD	1452	Ambient
Cooling Tower	204 gpm	Baltimore Aircoil Co.	FXT-68C	D95200217	TBD	1454	Ambient
Cooling Tower	114 gpm	Baltimore Aircoil Co.	FXT-38	932012888C	TBD	1455	Ambient
Cooling Tower	204 gpm	Baltimore Aircoil Co.	FXT-68	97226181	TBD	1477	Ambient
Nitric Tank	NA	NA	NA	NA	NA	20009	GD2
HCl Tank	NA	NA	NA	NA	NA	20010	GD2
HCl Tank	3 gpm	Leatherwood Platics	NA	2584SE-A	Nov-12	20027	GD2
Chemtool 193 Tank	NA	NA	NA	NA	NA	20029	GD2
Methanol Tank	1,600 Gallon	NA	NA	NA	NA	20005	Ambient
Oil-Water Evaporator	0.195 MMBtu/hr	NA	NA	NA	NA	TBD	GD7
Gun Range	NA	NA	NA	NA	NA	NA	GD1
Gun Range (New)	NA	NA	NA	NA	NA	NA	GD5
CS Gun Range	NA	NA	NA	NA	NA	NA	GD4
S6 High Temp Salt Tank	NA	Ajax Electric	HCRE	3827-A	NA	1371	GD2
S6 High Temp Salt Tank	NA	Ajax Electric	HCRE	5208-1	NA	9729	GD2
Black Oxide Salt Tank	NA	Du-Lite Corp.	NA	NA	NA	20015	GD2
Black Oxide Salt Tank	NA	Du-Lite Corp.	NA	NA	NA	20016	GD2
Black Oxide Salt Tank	NA	Du-Lite Corp.	NA	NA	NA	20017	GD2
Black Oxide Salt Tank	NA	Du-Lite Corp.	NA	NA	NA	20018	GD2
Alkaline Cleaner Tank	3,750 Watts	Chromalox	146559-039	NA	NA	20014	GD2
Alkaline Cleaner Tank	NA	Du-Lite Corp.	NA	NA	NA	20012	GD2
Alkaline Cleaner Tank	NA	Du-Lite Corp.	NA	NA	NA	20013	GD2

EQUIPMENT TYPE	MAX. CAPACITY	MAKE	MODEL	SERIAL NUMBER	DATE OF MFG.	Equipment ID Number	Stack ID
Water Tank	NA	Du-Lite Corp.	Hot Rinse	NA	NA	20021	GD2
Water Tank	NA	Du-Lite Corp.	Hot Rinse	NA	NA	20023	GD2
Water Tank	NA	Du-Lite Corp.	Hot Rinse	NA	NA	20025	GD2
Water Tank	NA	Du-Lite Corp.	Cold Rinse	NA	NA	20022	GD2
Water Tank	NA	Du-Lite Corp.	Cold Rinse	NA	NA	20024	GD2
Water Tank	3 gpm	Leatherwood Platics	NA	2584SE-B	Nov-12	20028	GD2
Water Tank	NA	Du-Lite Corp.	NA	NA	NA	20019	Ambient
Water Tank	NA	Du-Lite Corp.	NA	NA	NA	20020	Ambient
Water Storage Tote	330 Gallon	NA	NA	NA	NA	TBD	Ambient
Diesel Tank	1,500 Gallon	ISCO	NA	24Z07476	Oct-96	0930	Ambient
Methanol Tank	55 Gallon	Manchester	M4500	603900	Oct-00	20006	Ambient
Methanol Tank	55 Gallon	Manchester	M4500	392962	Mar-97	20007	Ambient
Methanol Tank	55 Gallon	Manchester	M4500	626710	Jan-13	20008	Ambient